

ORIGINAL

Owner and Operator of

FILE

Standard TOBACCO COMPANY

INCORPORATED

- Limestone Cable Vision, Inc.
- Bracken Cable Vision, Inc.
- Radio Station WFTM - AM-FM
- Standard Supply Company
- Standard Tobacco Warehouse
- Standard Quick Print
- Central Supply Company

TOBACCO SQUARE

626 FOREST AVENUE

MAYSVILLE



41056

Before the
Federal Communications Commission
Washington, D.C. 20554

RECEIVED

DEC 10 1992

In the Matter of)

Implementation of the)
Cable Television Consumer)
Protection and Competition)
Act of 1992)

MM Docket No. 92-259

Broadcast Signal Carriage)

RECEIVED
DEC 10 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF STANDARD TOBACCO COMPANY, INC.

Proposed Rule Change for the Cable Television Consumer
Protection and Competition Act of 1992,
Concerning Conflicting ADI Television Markets.

As I understand the 1992 Cable Act, the FCC will be writing the Rules governing this Act. The two cable vision systems we own and operate are in an unusual situation, and I hope you do consider the request I am making when you are writing these rules.

The cable systems we have are Limestone Cable Vision, Inc. in Mason County, Kentucky and Bracken Cable Vision, Inc. in Bracken County, Kentucky. In Bracken County we have two different cable vision systems, serving 547 subscribers from one headend, and 477 subscribers from other headend. The two headends in this county are 36 miles from Cincinnati, Ohio and 46 miles from Lexington, Kentucky. The cable vision system in Mason County has a total of 4530 subscribers, and this headend is located 55 miles from Cincinnati, Ohio and 55 miles from Lexington, Kentucky.

Attached to this letter is the ADI Map of the Cincinnati, Ohio television market, and it shows the Counties of Bracken and Mason are on the bottom edge of this market, and touch the top part of the Lexington, Kentucky television market. For many years we have carried on both these cable systems the affiliate networks of ABC, CBS, NBC, and FOX from Cincinnati, Ohio and ABC, CBS, and NBC from Lexington, Kentucky. After reading 1992 Cable Act and talking with our Washington, D.C. attorneys, the only way we can carry the Lexington, Kentucky network affiliates is for their contracts with

their respective Network Affiliates, is to read that they can sell their signals into another network's ADI Television Market.

Just recently we mailed out a survey card (one of cards enclosed) to one third of all of our subscribers, asking them to return the card, and to mark on it what channels they like to watch the most, either the Cincinnati, Ohio television channels, or the Lexington, Kentucky television channels. The results came back 621 subscribers prefer to watch the Lexington, Kentucky networks, while 385 like to watch the Cincinnati, Ohio networks. This indicates our subscribers by in large want the Lexington, Kentucky network affiliates to remain on these two cable vision systems. Just think how you would feel if you lived in a state and could not watch any of that state's television stations since you were in another city's ADI market. That's right - you would not like it at all.

Finally, I am asking you to determine that these 2 Cable Systems are actually part of more than one television market, and make a ruling that gives the stations in both markets "Must Carry Rights". Thus, granting us a "Waiver" to continue to carry all of the Cincinnati, Ohio and Lexington, Kentucky network television channels that we have been carrying on our cable vision systems for many years. I am quite confident that what I am calling an unusual situation of conflicting ADI television markets is not so unusual, and will occur in many other communities across the country.

Thank you for your time, and Please do consider my request.

Respectfully,

December 7, 1992

James A. Finch,
Vice President
Standard Tobacco Company, Inc.
P.O. Box 100
Maysville, Kentucky 41056

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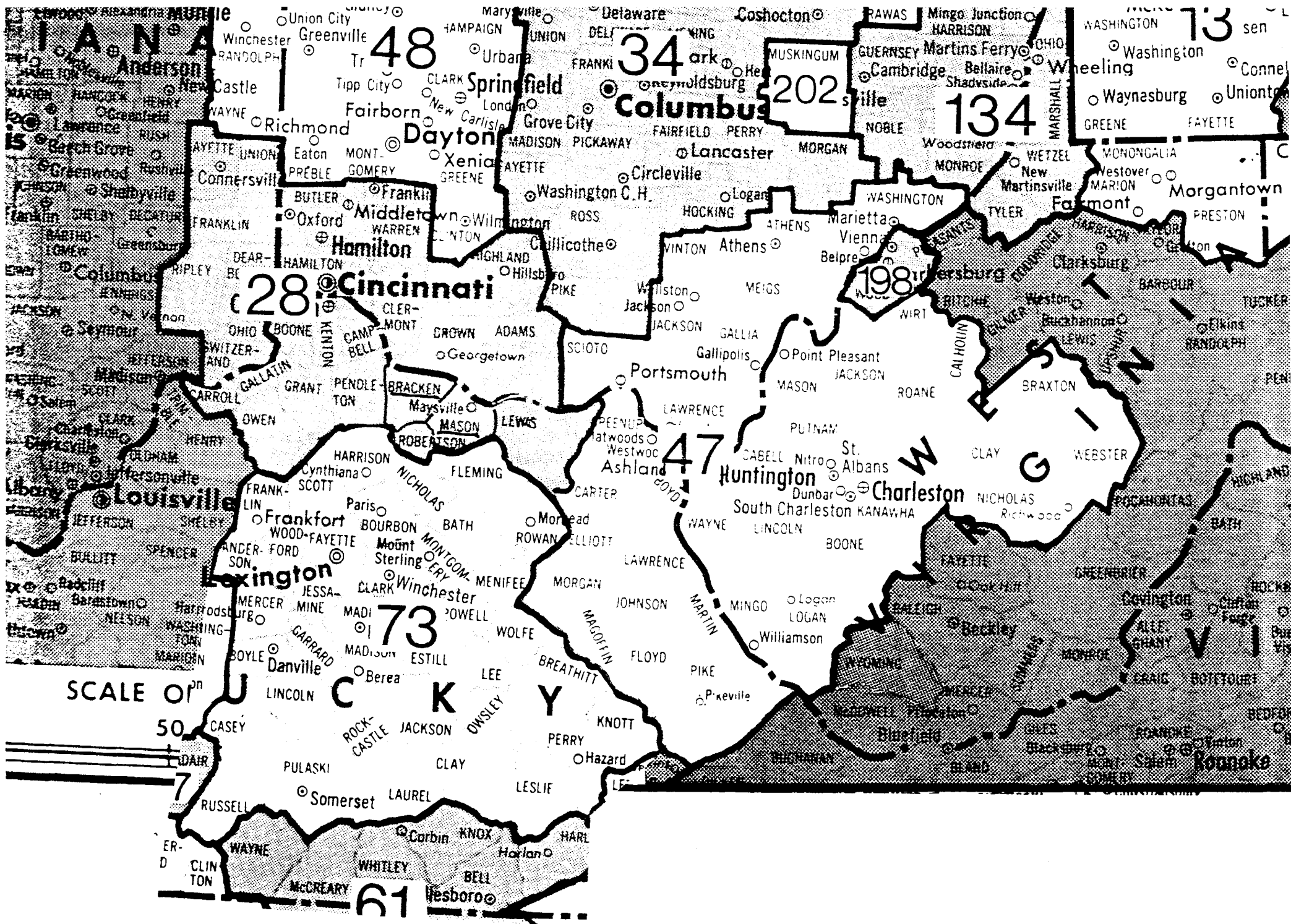
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**Please Check The "4" Favorite Channels
You Like To Watch The Most.**

<input checked="" type="checkbox"/> WTVQ (36) Lexington ABC	<input type="checkbox"/> WXIX (19) Cincinnati IND
<input checked="" type="checkbox"/> WKYT (27) Lexington CBS	<input checked="" type="checkbox"/> WCPO (9) Cincinnati CBS
<input type="checkbox"/> WLEX (18) Lexington NBC	<input type="checkbox"/> WKRC (12) Cincinnati ABC
<input type="checkbox"/> WLWT (5) Cincinnati NBC	<input checked="" type="checkbox"/> WSTR (64) Cincinnati IND

**Please Return This Card To Your Local
Cable Vision Office Or To Standard Quick Print,**
Corner of 68 and AA Highways in Maysville.

Thank You!